

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA**

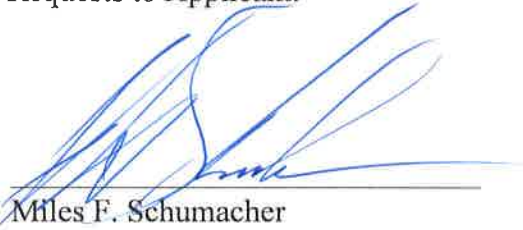
IN THE MATTER OF THE APPLICATION)
BY CROWNED RIDGE WIND II, LLC FOR)
A PERMIT OF A WIND ENERGY)
FACILITY IN DEUEL, GRANT)
AND CODINGTON COUNTIES)

EL19-027

) **APPLICANT'S RESPONSES TO**
) **INTERVENORS AMBER**
) **CHRISTENSON, KRISTI MOGEN**
) **AND ALLEN ROBISH'S FIRST**
) **SET OF DATA REQUESTS TO**
) **APPLICANT**

Attached please find Applicant's Responses to Intervenor Amber Christenson, Kristi Mogen and Allen Robish's First Set of Data Requests to Applicant.

Dated December 2, 2019.



Miles F. Schumacher
Attorneys for Applicant
Lynn, Jackson, Shultz & Lebrun, PC
110 N. Minnesota Ave., Suite 400
Sioux Falls, SD 57104

- 1-1) Provide copies of all data requests submitted to or by you and copies of all responses provided to those data requests. Provide this information to date and on an ongoing basis.

Response: Crowned Ridge Wind II will provide copies of all data requests submitted to or by Crowned Ridge Wind II and copies of all public responses provided to those data requests. This information will be provided on the date it is submitted.

Respondent: Miles Schumacher, Attorney

- 1-2) Provide any correspondence with the Minnesota PUC regarding Crowned Ridge II. Include all correspondence relating to the MISO interconnection, project ownership, commercial operation date, project progress and schedule, current status as relating to project development and target dates, landowner notifications, and any project delays, changes, concerns or failures.

Response: Crowned Ridge Wind II has submitted no correspondence to the Minnesota PUC, and, therefore, there are no documents responsive to this request.

Respondent: Daryl Hart, Director Business Development

- 1-3) Provide all FAA Determinations for the Crowned Ridge II project. At the public input hearing, August 26, 2019, 4 turbines were still undetermined. Please identify those 4 turbines and provide the updated status of those turbines as well the determinations of all other turbines.

Response: Please see Attachment 1 to Crowned Ridge Wind II's response to Staff Data Request 1-6 for the FAA determination of no hazard (DNH) received to date. Please see Crowned Ridge Wind II's response to Staff Data Request 2-11, which lists all turbine locations that require DNHs from the FAA. The 4 turbine locations noted as undetermined at the public input meeting were associated with pending easement agreements, which Crowned Ridge Wind II has since obtained. One of the 4 locations noted at the public input meeting requires a DNH; that turbine location is CRII-126.

Respondent: Tyler Wilhelm, Senior Project Manager

- 1-4) Provide Applications, Staff Reports, Findings of Fact and any Conditions regarding Grant and Codington County CUPs.

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Respondent: Miles Schumacher, Attorney

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Respondent: Tyler Wilhelm, Senior Project Manager

- 1-4) Provide Applications, Staff Reports, Findings of Fact and any Conditions regarding Grant and Codington County CUPs.

Response: Crowned Ridge Wind II objects to Data Request 1-4 because the information sought is a matter of public record and equally available to intervenors. Crowned Ridge Wind II also objects because Data Request 1-4 is not reasonably calculated to lead to discovery of admissible evidence in this proceeding before the PUC. Subject to and without waiving these objections, Crowned Ridge Wind II provides Attachments 1 and 2.

Respondent: Tyler Wilhelm, Senior Project Manager

- 1-5) At the public input meeting, August 26, 2019, when asked about funding the project, Daryl Hart answered, 'There is no money assigned to Crowned Ridge II.' Provide with specificity how Crowned Ridge II would fund this project if permitted.

Response: As explained in Sections 1.1 and 3 of the Application, Crowned Ridge Wind II will be transferred to Northern States Power Company, who will own the project after the sale transaction is completed.

Respondent: Daryl Hart, Director Business Development

- 1-6) Please provide the annual balance sheet annual profit and loss statement for the Applicant for the last three years. The undersigned intervenors will sign an appropriate protective agreement on this matter.

Response: Crowned Ridge Wind II does not have an annual balance sheet annual profit and loss statement for the last three years, and, therefore, there are no documents responsive to this request.

Respondent: Daryl Hart, Director Business Development

- 1-7) Is the Applicant a party to any litigation with respect to this Project or the combined project which includes Crowned Ridge Wind, LLC? If yes, provide details.

Response: Crowned Ridge Wind objects to Request 1-7, because it is not reasonably calculated to lead to discovery of admissible evidence in this proceeding before the PUC. Subject to and without waiving the objection, Crowned Ridge provides the following response:

Crowned Ridge Wind II is a party to the following cases: CIV. 19-303 (Coddington County); CIV. 19-009 (Grant County); CIV. 19-007 (Grant County) and CIV. 18-061 (Deuel County).

Respondent: Miles Schumacher, Attorney

- 1-8) Provide in detail, Applicant's plan of disposal of any and all blades during the construction, operations, and decommissioning phases of the project. Include documentation of acceptance by the refuse authority, and details of requirements of the acceptance, such as size, composite materials allowed or disallowed, full blades, cut size, crushed, ground, or any conditions required of disposal.

Response: Wind turbine blade disposal at the end of the blade's useful life will be handled either by Crowned Ridge Wind II or contracted to entities which specialize in the transportation and disposal of fiberglass wind turbine blades. The blades will be cut into 8' to 10' increments and deposited in landfills pursuant to applicable law.

Respondent: Mark Thompson, Manager Wind Engineering

- 1-9) Tyler Wilhelm's Direct Testimony, page 12, lines 9-11, "How many homes can be served by the clean energy that the wind facility will deliver? The Wind Facility will deliver enough energy to power more than 150,000 homes." Please explain. Is the power continuous, nighttime, wintertime, high load time, annually, weekly, hourly? Specify kilowatts of power provided per household, size of residence, location of residences, duration of power provided. Provide the study.

Response: The Crowned Ridge Wind II facility can deliver power to satisfy the demand for approximately 150,000 homes located in South Dakota. To elaborate, the Crowned Ridge Wind II facility can produce 1,314,000,000 kilowatthour (kWh)/yr. or 109,500,000 kWh/mo. A single family home in South Dakota consumes approximately 65 kWh/mo. in the summer and 942 kWh/mo. during the winter, according to data from Otter Tail Power Company, which can be found at the following link as Attachment 3s – SD Rate Base Summary <https://puc.sd.gov/Dockets/Electric/2018/el18-021.aspx>. Therefore, Crowned Ridge Wind II can supply 148,004 homes in the summer and 120,194 homes in the winter. The power from the Crowned Ridge Wind II is continuous, and provided nighttime, wintertime, high load time, annually, weekly, hourly when the wind is powering the turbines. When producing power, Crowned Ridge Wind II's energy generated is integrated into the existing power grid and becomes part of the energy mix that is available during all periods of demand including at nights and at peak demand throughout the year.

Respondent: Mark Thompson, Manager Wind Engineering

- 1-10) Provide a list of all the affiliations, entities, affiliated entities, corporations, associations, doing business as (DBA), limited liability company (LLC), incorporation (INC), partnerships and agents that have been associated with the applicant Next Era and CRW II LLC since 2008 in South Dakota.

Response: Crowned Ridge Wind II objects to Data Request 1-10 as overly broad, not relevant to the scope of the proceeding, and not reasonably calculated to lead to the discovery of admissible evidence in this proceeding before the Commission. Subject to and without waiving these objections, Crowned Ridge Wind II provides the following response.

To the best of Crowned Ridge Wind II's knowledge, the following list includes all affiliations, entities, affiliated entities, corporations, associations, doing business as, limited liability company, incorporation, partnerships and/or agents that have been associated with Crowned Ridge Wind II since 2008 in South Dakota:

- Crowned Ridge Wind, LLC;
- Crowned Ridge Wind II, LLC;
- Cattle Ridge Wind Farm, LLC;
- Cattle Ridge Wind Holdings, LLC;
- Tower Associates, LLC;
- Boulevard Associates, LLC;
- SWCA Environmental Consultants, Inc.;
- EAPC Wind Energy Services, LLC.;
- OEHM
- HDR Engineering, Inc.;
- Ulteig Engineers, Inc.;
- Burns & McDonnell Engineering Company Inc.;
- P&E Engineering Co.;
- Barr Engineering Co.;
- Snyder & Associates, Inc.;
- Capitol Airspace Group, LLC;
- Beta Land Services, LLC; and
- CanAcre.

Respondent: Tyler Wilhelm, Senior Project Manager